

**PATENT APPLICATION**

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**

In re application of

Docket No: Q68452

Marco PETERS, et al.

Appln. No.: 10/049,507

Group Art Unit: 2143

Confirmation No.: 7621

Examiner: William Vaughn, Jr.

Filed: February 13, 2002

For: TELECOMMUNICATION SYSTEM, AND NETWORK, AND TERMINAL, AND  
GENERATOR, AND METHOD

**REQUEST FOR RECONSIDERATION UNDER 37 C.F.R. § 1.111**

**MAIL STOP AMENDMENT**

Commissioner for Patents

P.O. Box 1450

Alexandria, VA 22313-1450

Sir:

In response to the Office Action dated November 18, 2005, please consider the following remarks.

**REMARKS**

Claims 1-32 remain in the application. Applicants acknowledge with appreciation the indication of patentable subject matter in claims 19, 23, 26, 29 and 32, but respectfully request reconsideration of the application and allowance of the remaining claims in view of the above amendments and the following remarks.

In his only rejection, the examiner has rejected claims 1-18, 20-22, 24, 25, 2, 28, 30 and 31 as unpatentable over Gupta in view of Ebrahim, both previously cited, and in further view of McCann (USP 6,052,725) newly cited in this Office action. This rejection is respectfully traversed.

It appears that the rejection of claim 20 has been in error, since it depends from claim 19 which is indicated as being allowable. Clarification is respectfully requested.

With regard to claims 11-18, 21, 22, 24, 25, 27, 28 (not listed in paragraph 19 but presumably through oversight), 30 and 31, these claims were all added in the amendment filed August 24, 2005 specifically to claim features of the invention applicants believe are NOT known in the art. The examiner has not cited any art even allegedly teaching these features, but has dismissed all in paragraph 19 of the Office action as being “extremely well known in the art.” The attention of the examiner is respectfully directed to MPEP 2144.03 for a clear and detailed discussion by the USPTO as to when the taking of Official Notice is warranted and how it should be done. Further, pursuant to MPEP 2144.03(C), applicants respectfully request that the examiner cite documentary evidence supporting the assertion that the subject matter of each of claims 11-18 was very well known in the art.

Regarding claims 11 and 12, the undersigned is not aware of a prior art system in which the *same* URL is entered by two different users at different locations and this will result in the generation of different addresses to a memory holding the information to be supplied in response to that same URL.

Regarding claims 13 and 14, the undersigned is unaware of any prior art system in which the *same* user sends the *same* URL and this will result in the generation of different addresses to a memory holding the information to be supplied in response to that *same* URL, with the different addresses depending on the location of the user at the time the URL is sent..

Regarding claims 15 and 16, the undersigned is unaware of any prior art system in which two different users generate the *same* URL at different times from the same location and this will

result in the generation of different addresses to a memory holding the information to be supplied in response to that *same* URL.

Regarding claims 17 and 18, the undersigned is unaware of any prior art system in the *same* user sends the *same* URL from the same location but at different times, and this will result in the generation of different addresses to a memory holding the information to be supplied in response to that *same* URL, with the different addresses depending on the time at which the URL is sent.

All of claims 11-18 are believed to define subject matter not shown or suggested in any prior art, and allowance of all of these claims is requested in the absence of prior art teaching such subject matter.

Turning now to claims 1-10, applicants previously pointed out that Gupta and Ebrahim fail to teach the provision of different information to two different users who generate the same control signal, or to a single user who generates the same control signal at two different times. The examiner now cites McCann for its teaching of dynamic IP addressing which permits dynamic IP addresses to be re-used by different communications devices that connect to networks at different times. Applicants do not contest this teaching of McCann, and acknowledge that dynamic IP addressing has been known for some time. But this is not what is claimed, nor does it render obvious what is claimed.

The examiner states the conclusion that incorporating the teaching of McCann with the teachings of Gupta-Ebrahim would have been obvious and would have resulted in the subject matter of claim 1. There is a very large gap left unexplained by this assertion. Dynamic IP addressing is just what the examiner states, i.e., allowing IP addresses to be re-used. So if we

add dynamic IP addressing to the teachings of Gupta-Ebrahim, we have a system where a user may have a different IP address at different times. That still leaves no teaching of a system where a user with different IP addresses at different times will submit the same URL at different times or from different locations and have that result in the generation of different addresses to a memory from which information is read out. And even if there were such a teaching, that is an IP address dependency, not a time dependency or a location dependency. The citation of McCann seemingly has nothing to do with the claim language or the distinguishing arguments presented by applicants in the previous response. All of the distinguishing arguments presented in that previous response are incorporated here and repeated.

Further, the examiner has provided no response to the arguments presented in the previous response. He has begun the Office action by stating in paragraph 2 that the arguments are moot in view of the new grounds of rejection, but has then repeated the entire same analysis as in the previous action but has not provided any explanation as to how the newly-cited art teaches the features applicants relied on in arguing patentability. Accordingly, if the examiner will maintain the rejection of claims 1-10 in the next Office action, applicants respectfully request that the Office action should include a complete rebuttal of the grounds of traversal, as is required by MPEP 706.07.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner believes could be resolved through an Examiner's Amendment or a supplemental response, the examiner is kindly requested to contact the undersigned at the local telephone exchange listed below.

Request for Reconsideration Under 37 CFR 1.111  
USSN 10/049,507

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

**23373**

CUSTOMER NUMBER

Date: February 23, 2006

/DJCushing/  
David J. Cushing  
Registration No. 28,703